

EXHIBIT 66
FILED UNDER SEAL

15 FRIDAY APRIL 7 2023

16 CONFIDENTIAL - ATTORNEYS' EYES ONLY

17

23

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1 Epstein's accounts?

2 MR. BUTTS: Objection.

3 You may answer.

4 THE WITNESS: Escalate

5 concerns? No.

6 QUESTIONS BY MS. LIU:

7 Q. Escalate anything else?

8 A. Yes.

9 Q. What would that be?

10 A. I escalated concerns for
11 reputational risk. I also, in response to a
12 request from compliance -- well, escalated
13 concerns with respect to reputational risk, I
14 would say.

15 Q. And what does that mean?

16 A. I would escalate my concerns
17 for whether -- my concerns around the
18 reputation of the firm and who we were
19 working with at the time.

20 Q. Specifically what concerns did
21 you escalate for reputational risk with
22 respect to Jeffrey Epstein's accounts?

23 A. Post-2006, when there was media
24 reports with respect to his behavior, I would
25 share my concerns with respect to the media

1 THE WITNESS: I escalated a
2 concern.

3 QUESTIONS BY MS. LIU:

4 Q. And what was your concern?

5 A. My concern was the reputational
6 risk of the client.

7 Q. And that was based on seeing
8 these news reports, correct?

9 A. That is correct.

10 Q. And Mary Erdoes also saw these
11 news reports, correct?

15 MR. BUTTS: Objection to form.

16 You may answer.

17 THE WITNESS: She was on that
18 e-mail, yes.

19 QUESTIONS BY MS. LIU:

20 Q. Do you know if she was worried,
21 too?

22 A. I do not know.

23 Q. And you were uncertain after
24 seeing those news reports whether you wanted
25 to continue to cover Jeffrey Epstein,

1 Q. And you wrote those words in
2 April of 2004, correct?

3 A. Correct.

4 Q. "The Epstein/Wexner
5 relationship generated over 8.5 million in
6 revenue in 2003."

7 Do you see that?

8 A. I do.

9 Q. And at the end of that e-mail
10 you say, "Please thank him" -- I believe
11 you're referring to Mr. Indyke -- "for his
12 consistent support to us on such a, quote,
13 crucial relationship to the private bank."

14 Do you see that?

15 A. I do.

16 Q. Does that refresh your
17 recollection that the Epstein/Wexner
18 relationship was generating over 8.5 million
19 in revenue in 2003?

20 A. That refers to the Wexner
21 relationship and the Epstein relationship,
22 yes, combined.

23 Q. And you believe that that
24 relationship was a, quote, crucial
25 relationship to the private bank; is that

1 fair?

2 A. Mr. Wexner was a crucial
3 relationship to the private bank, yes.

4 Q. And Mr. Epstein?

5 A. Mr. Epstein was the money
6 manager for Mr. Wexner, yes. So, therefore,
7 he was part of an important relationship.

8 Q. And Mr. Epstein had, at one
9 point under you, 72 accounts with over
10 \$120 million with the bank, correct?

11 A. I don't know.

12 Q. Mr. Epstein was also a crucial
13 relationship to the bank, correct?

14 A. Those are your words, not mine.

15 Q. I'm asking you. Those are
16 actually your words in this e-mail,
17 Ms. Casey.

18 A. My e-mail refers to Leslie
19 Wexner.

20 Q. The Epstein/Wexner
21 relationship.

22 A. Correct, because Mr. Epstein
23 was the money manager for Mr. Wexner.

24 Q. And the crucial relationship
25 was the Epstein/Wexner relationship, correct?

1 compliance department that I believe taps
2 into -- again, this is institution
3 organizational structure that I'm --

4 Q. Okay. So you might be
5 getting --

6 MR. BUTTS: Hold on. I don't
7 think she finished.

8 Did you finish your answer?

9 THE WITNESS: Yeah. So, I
10 mean, I'm familiar with it in a
11 general way. I can't speak to it with
12 specificity.

13 QUESTIONS BY MS. LIU:

14 Q. Do you recall being involved in
15 a rapid response team meeting for Jeffrey
16 Epstein in October of 2006?

17 A. I don't recall specific
18 meetings, no.

19 Q. Do you know what a rapid
20 response team meeting is?

21 A. So -- yes.

22 Q. What is a rapid response team
23 meeting?

24 A. So a rapid response meeting is
25 the result of -- it's an escalation point

1 when derogatory information or something of
2 note happens in a given client relationship.

3 Q. And do you recall participating
4 in rapid responses team meetings for any
5 other clients besides Jeffrey Epstein?

6 A. I don't recall specific
7 meetings, no.

8 Q. Would you agree or disagree
9 that it's rare for there to be a rapid
10 response team meeting for a private bank
11 client?

12 A. It is not rare.

13 Q. And do you recall that in total
14 there were four rapid response team meetings
15 related to Jeffrey Epstein?

16 A. I don't know the exact number.

17 Q. Do you have any reason to think
18 that there might have been more than four
19 rapid response team meetings related to
20 Jeffrey Epstein?

21 A. I don't know.

22 (Casey Exhibit 19 marked for
23 identification.)

24 QUESTIONS BY MS. LIU:

25 Q. Okay. I'm handing you what has

1 Epstein escalated to Jamie Dimon?

2 A. No. It was escalated to

3 Stephen Cutler.

4 Q. And that's what you said on
5 Exhibit 25 a few months earlier, right? You
6 asked -- you recall you asked Lisa Waters:
7 When is the decision due to be made by
8 Cutler?

9 You remember you referenced
10 Cutler by name?

11 A. I did.

12 Q. And then a few months later,
13 you don't reference Cutler. You say,
14 "Pending Dimon review."

15 Why did you say Dimon and not
16 Cutler, as you had previously stated, if it's
17 your testimony that it was pending Cutler
18 review?

19 A. Uh-huh.

20 Well, I don't remember penning
21 this e-mail exactly, but reading it today, I
22 know that I intended that to be Cutler, and I
23 did not mean it to be Jamie Dimon, as he had
24 nothing to do with this.

25 Q. How do you know he has nothing